O'TOOLE SCRIVO

O'TOOLE SCRIVO FERNANDEZ WEINER VAN LIEU, LLC

ROBERT W. GIFFORD
rgifford@oslaw.com

July 18, 2017

Via ECF
Honorable Edgardo Ramos, U.S.D.J.
Southern District of New York
40 Foley Square
New York, New York 10007

Re: DeWan v. Peter Seideman d/b/a Law Office of Peter Seideman
Case No. 17-CV-1315
Our File No. 590-374

Dear Judge Ramos:

This firm represents Defendant, Peter Seideman Attorney LLC (i/p/a "Peter Seideman d/b/a Law Office of Peter Seideman") (hereinafter referred to as "Seideman"). The parties recently appeared before Your Honor on July 5, 2017, for a pre-motion conference in which Your Honor requested that counsel provide you with a report by July 19, 2017. With the consent of my adversary, we respectfully request additional time to provide Your Honor with this report.

By way of background, Plaintiff requested permission to file an Amended Complaint during the pre-motion conference. At that time, we could not consent without an opportunity to review the proposed amendment and consult with our client. As such, Your Honor directed Plaintiff to draft the proposed amendment and forward it to counsel for review to determine whether Seideman will consent or require Plaintiff to file a motion. Due to preparing and traveling for an out-of-state hearing, Plaintiff's counsel did not provide our office with the proposed amendment until this morning. We respectfully submit that twenty-four hours is not sufficient time to review the proposed amendment and confer with our client before advising the Court of whether Plaintiff would need to file a motion. Accordingly, we respectfully request an additional two weeks to analyze the proposed pleading, confer with our client, and advise the Court as to whether we will consent.

We thank Your Honor for his attention to this matter.

Respectfully submitted,

Robert W. Gifford

cc: Brian L. Bromberg, Esq. (via ECF)